

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Nebraska Public)	Application No. 911-014/PI-99
Service Commission, on its own motion,)	
to investigate issues related to the current)	
state of landline and enhanced wireless)	COMMENTS OF
911 service and the means to ensure)	VERIZON WIRELESS
statewide access to landline 911 and)	
enhanced wireless 911 service.)	

Verizon Wireless submits the following comments in response to the Commission's Order entered June 28, 2005, inviting comments from interested parties regarding the current state of landline and enhanced wireless E911 service and the means to ensure statewide access to landline E911 and enhanced wireless E911 service.

ISSUE 3: The current status of enhanced wireless 911 throughout the state.

COMMENT: Verizon Wireless provides wireless service only in Douglas and Sarpy Counties in Nebraska. Verizon Wireless has deployed Phase I E911 service in both counties as of March 6, 2002 and February 26, 2002, respectively. On June 30, 2005, Douglas County requested Phase II E911 service, which Verizon Wireless expects to have operational by the end of 2005 at no additional cost to the PSAP.

ISSUE 4: Implementation of enhanced wireless 911 in other states.

COMMENT: The status of Verizon Wireless' deployment of Phase I and Phase II E911 service throughout the 6,700 PSAPs located in the Country as of July 15, 2005:

<u>Phase I Live</u>		<u>Phase II Live</u>	
PSAPs	2,970	PSAPs	1,986
Population (M)	201	Population (M)	163
States	48	States	44

Verizon Wireless is working to achieve compliance with the FCC's requirement that 95% of Verizon's customers have GPS-capable handsets by December 31, 2005.

Verizon Wireless respectfully requests the Commission to notify the public that if they have not purchased a new phone in the past 2-3 years, their current phone may not be equipped with a GPS chipset and, if not, would be unable to provide information about a subscriber's location in the event of an emergency. All of the wireless phones that Verizon Wireless sells today are GPS- capable and should an emergency arise in Douglas and Sarpy Counties, these phones can be located by the PSAP once Phase II has been deployed.

ISSUE 5: Reimbursement of the costs of wireless service providers.

COMMENT: Verizon Wireless has been billing the state since early 2003 for Phase I service on 51 sites in Douglas and Sarpy County.

Verizon Wireless will upgrade from Phase I to Phase II at no additional cost to the PSAP, *i.e.*, Verizon Wireless will not seek reimbursement from the cost-recovery pool for these upgrades.

ISSUE 6: Distribution of the wireless surcharge.

COMMENT: Verizon Wireless has been billing the cost recovery pool for Phase I upgrades at the rate of approximately \$3600 per month for 51 sites.

ISSUE 8: Consolidation of public safety answering points.

COMMENTS: Verizon Wireless participated in discussions resulting with the National Emergency Number Association's report prepared by the Monitor Group entitled "Analysis of the E9-1-1 Challenge, dated December 2003", (the "NENA SWAT Report"). Section 5 of the NENA SWAT Report, entitled "State and Federal Coordination and Oversight", is relevant to issue 8. Among the conclusions contained in Section 5, are the following:

"...single points of contacts for E9-1-1 coordination within a state can significantly help deployment both in terms of acceleration and efficiency. Consolidation for the scope and authority of this role include the following:

- *Managing and coordinating intra-state deployment.* A state coordination function may be in the best position to understand the various regional situations within local government jurisdictions, to structure a deployment plan according to these needs, and to identify ways to increase deployment efficiencies (e.g., staggering WSP testing schedules), if needed. Additionally, a state level coordinator may be more likely, in most circumstances, to gain the trust of local public safety officials than would a federal level coordinating body.
- *Coordinating inter-state deployment.* Addressing deployment inefficiencies in conjunction with neighboring states may help a state coordination function to complete their PSAP deployment in a timely and more cost-effective manner.
- *Coordinating/monitoring of valid requests and mediating disputes:* Given that a state coordination function likely has substantial local knowledge, they may be in the best position to mediate readiness disputes, if necessary and requested, between SSPs, WSPs and PSAPs. State coordination functions may have more impact and control over the overall statewide timeliness, as they will be more closely attuned to potential obstacles.
- *Disbursing and auditing of federal grants and reconciling budgets.* State coordination functions are in the best position to serve as single points of

contract and serve as the entity accountable for distribution and appropriate use of federal funds.

- *Educating and building awareness.* Interviews with local government PSAP managers and officials indicate that lack of education and awareness has been a barrier to wireless E-9-1-1 deployment. State coordination functions may have the best vantage point to understand the knowledge gaps, the availability of education materials, and the appropriate educational campaigns required for the impacted stakeholders (e.g., state and local officials, general public, public safety personnel).”

CONCLUSION

Since 2001, Verizon Wireless has implemented extensive network improvements throughout its nationwide network, purchased enhanced handsets, and completed a complex series of tasks to enable it to provide enhanced E911 Phase I and Phase II location services to the public. Verizon Wireless now provides Phase II E911 service to a total of 1,986 PSAPs serving an estimated population of 163 million residents in parts of 44 states. Much more needs to be done to strongly encourage and support these local PSAPs to take all necessary steps to upgrade their facilities to be able to receive and use these improvements. Verizon Wireless would also encourage this Commission to make the public aware that they may need to upgrade their older handsets to assist Public Safety in determining their location in case of an emergency. Verizon Wireless stands ready to urgently support the E-911 roll out in Nebraska.

Dated: July 29, 2005

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